

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	
	:	
Frances Emmons Rogers	:	Case No.: 18-15460
	:	Chapter 13
Debtor(s).	:	Judge Jean K. FitzSimon
	:	*****

OBJECTION OF WELLS FARGO BANK, N.A. TO CONFIRMATION OF THE PLAN

Wells Fargo Bank, N.A. ("Creditor") by and through its undersigned counsel, objects to the confirmation of the currently proposed Chapter 13 Plan ("Plan") filed by Frances Emmons Rogers ("Debtor") as follows:

1. Creditor holds a security interest secured by a mortgage lien on Debtor's property commonly known as 701 Panmure Road, Haverford, PA 19041 ("Property").
2. Creditor intends to file a Proof of Claim including a pre-petition arrearage in the approximate amount of \$729,190.00.
3. Debtor's Plan fails to provide for Creditor's secured claim, including the arrearage due on Creditor's claim, and suggests that Creditor's claim will be addressed through a loan modification.
4. However Creditor has not offered a permanent loan modification agreement to Debtor.
5. Debtor's Plan fails to meet the requirements of 11 U.S.C. §1325(a)(5) as it fails to provide for Creditor's secured claim. Creditor requests that Debtor amend the Plan to either provide for Creditor's claim or to surrender their interest in the Property.

WHEREFORE, Creditor respectfully requests that the Court deny the confirmation of the Debtor's currently proposed Plan.

Respectfully submitted,

/s/ Karina Velter

Karina Velter, Esquire (94781)

Kimberly A. Bonner (89705)

Adam B. Hall (323867)

Sarah E. Barngrover (323972)

Manley Deas Kochalski LLC

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Attorneys for Creditor

The case attorney for this file is Karina Velter.

Contact email is kvelter@manleydeas.com

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Objection of Wells Fargo Bank, N.A. to Confirmation of the Plan was served on the parties listed below via e-mail notification:

United States Trustee, Office of the U.S. Trustee, 833 Chestnut Street, Suite 500,
Philadelphia, PA 19107

William C. Miller, Chapter 13 Trustee, Chapter 13 Trustee, 2901 St. Lawrence Ave., Reading,
PA 19606

Paul A. Stewart, Attorney for Frances Emmons Rogers, 333 East Lancaster Avenue, Suite
140, Wynnewood, PA 19096, pstewart@legalthelm.com

The below listed parties were served via regular U.S. Mail, postage prepaid, on October 11,
2018:

Frances Emmons Rogers, Paul H. Rogers, Caroline Rogers and Joseph W. Rogers, Jr., 701
Panmure Road, Haverford, PA 19041

DATE: 10/11/18

/s/ Karina Velter

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